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Attorneys for Defendant

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	
)	Case No.: CR-11-0846 EJD
Plaintiff,)	
)	DEFENDANT'S EXPERT WITNESS
v.)	DISCLOSURE
)	
ASHVIN DESAI,)	Trial: March 18, 2013
)	Time: 9:00 a.m.
Defendant.)	Judge: Honorable Edward Davila
)	

Pursuant to Rule 16(b)(1)(C) of the Federal Rules of Criminal Procedure Defendant Ashvin Desai, by and through his undersigned counsel, hereby discloses his intention to call Mark E. Matthews, Esq. as an expert witness in this matter. Mr. Matthews will testify, based on his background and experience, to the procedures and circumstances related to the filing of Treasury Form TD F 90-22.1 Report of Foreign Bank and Financial Accounts ("FBAR").

Mr. Matthews obtained an A.B. from Harvard University in 1981, graduating *magna cum laude*; a J.D. from the New York University School of Law in 1985; and an M.P.A. from Princeton University in 1985. He is admitted to practice law in the District of Columbia and before the District of Columbia Court of Appeals, the U.S. Court of Appeals for the District of

1 Columbia Circuit, and the U.S. District Court for the District of Maryland. Mr. Matthews is a
2 Fellow of the American College of Tax Counsel and is a member of the Economic Club of
3 Washington; the American Bar Association, Criminal Justice and Tax Sections; and the
4 American Citizens Abroad, Professional Tax Advisory Council.

5 Mr. Matthews was previously global co-head of anti-money laundering at Deutsche
6 Bank, where he oversaw implementation of the Patriot Act, and, prior to that, was Chief of the
7 IRS Criminal Investigation Division, the agency's investigative and law enforcement arm,
8 renowned for its expertise in investigating financial crime, including tax, money laundering,
9 narcotics, and terrorism-related matters. From 1994 to 1998, Mr. Matthews was the Deputy
10 Assistant Attorney General of the U.S. Department of Justice Tax Division, where he led the
11 Department's criminal tax enforcement program. From 1993 to 1994, Mr. Matthews was Senior
12 Advisor to the Treasury Department's Assistant Secretary for Enforcement, where he was
13 Director of the Treasury Department's Anti-Money Laundering Task Force. Mr. Matthews was
14 also an Assistant U.S. Attorney in the Southern District of New York and then a Deputy Chief of
15 that office's Criminal Division, as well as special assistant to William H. Webster, first at the
16 FBI and then at the CIA.

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18 Date: 4 March 2013

Respectfully submitted
MARTIN A. SCHAINBAUM
A Professional Law Corporation

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21 By /s/ Martin A. Schainbaum, Esq.
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